

**Subject:** RE: Coalition's request for missing discovery files  
**Date:** Thursday, March 24, 2022 at 2:22:40 PM Eastern Daylight Time  
**From:** Robert McGuire  
**To:** btyson@taylorenghish.com, Vincent Russo  
**CC:** Josh Belinfante, Bruce Brown, Cary Ichter, David D. Cross - Morrison & Foerster LLP (dcross@mofo.com), Marilyn Marks, Jill Connors  
**Attachments:** Secretary of State's Office Opens Investigation into Coffee County's Handling of Recount Georgia S.pdf

Bryan,

As a follow-up to my email copied below, the attached December 9, 2020 press release from Secretary Raffensperger's office notes that, "Ms. Martin completed the recount upload and provided the Secretary of State's office with the documentation from their Election Management System to back up their uploaded results."

Please provide the referenced "documentation from the Election Management System" provided by Coffee County to the Secretary's office, which is unquestionably a relevant document that should have been produced in response to our prior discovery requests.

Best,  
Robert McGuire

ROBERT A. MCGUIRE, III

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**From:** Robert McGuire  
**Sent:** Tuesday, March 22, 2022 5:42 PM  
**To:** btyson@taylorenghish.com; Vincent Russo <[vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com)> <[vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com)>  
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**Subject:** Coalition's request for missing discovery files

Bryan,

The State Defendants' production of Election Project Files did not include Coffee County for either the November 2020 or the January 2021 elections.

Given that the Secretary conducted investigations of the Coffee County elections, it seems logical that the files would have been obtained by his office. Accordingly, please ask your client to search their records and produce the Election Project Files for those two elections. Please let us know your findings after this renewed search.

Additionally, in the attached minutes from the December 30, 2020, Senate Judiciary Committee meeting, please note that, on page 3, Ms. Latham says that she sent Gabe Sterling messages regarding the alleged problems in Coffee ballot processing. Please produce those emails and all related communications and documents.

Also in the video interview in this link, ([https://www.facebook.com/watch/live/?ref=watch\\_permalink&v=478684253122594](https://www.facebook.com/watch/live/?ref=watch_permalink&v=478684253122594)), Ms. Latham says at approximate time stamps 2:33 and 2:42 that she text messaged Secretary Raffensperger about problems in Coffee County. Please produce those communications and related documents and messages.

The foregoing documents referenced should certainly have been included in the production in response to Plaintiffs' discovery requests, or in supplemental productions, however we have not found these documents. Please provide them as soon as possible.

Thank you.

Best,  
Robert McGuire

ROBERT A. MCGUIRE, III

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